

# OSBORN LAW P.C.

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June 5, 2023

## VIA ECF

Honorable Katherine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**APPLICATION GRANTED**

Katharine H. Parker  
**Hon. Katharine H. Parker, U.S.M.J.**

Re: Tavarez v. Commissioner of Social Security  
Civil Action No. 1:22-cv-09656-KHP

**06/06/2023**

Dear Judge Parker,

We write on behalf of our client, Gloria M. Tavarez, to request additional time to file her motion for judgment on the pleadings which is currently due on June 6, 2023 per the Court's April 25, 2023 Order granting Extension for Time to File. This is the plaintiff's second request for an extension.

Counsel feels the time is necessary due to the length of the Administrative Transcript and the number of Social Security briefs we have due in the next two weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **July 26, 2023**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **September 25, 2023**; and
- Plaintiff to file her reply, if any, on or before: **October 16, 2023**.

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Candace Marie Brown Casey, Esq. (by ECF)